August 8, 2003

I've been studying the issue of the FCC proceeding 03-104 Broadband over Power Line (BPL).

As an avid Amateur Radio operator I am very concerned over the interference BPL will cause to FCC assigned amateur radio frequencies. BPL was tried in Japan and soundly defeated due to the massive interference problem. There are examples on the internet of the type of interference BPL causes to ham frequencies.

Currently the FCC is accepting comments on their electronic comment filing system (ECFS) filed in response to previously filed comments to the FCC's original inquiry. In response to this notice of inquiry (NOI) the BPL industry filed comments indicating that field trials revealed no reported interference to other services. See for example this excerpt from the United Power Line Council's filed comments:

Interference: In this proceeding, the FCC inquires concerning the potential for interference from BPL systems under the existing Part 15 emission limits,[1] and it inquires whether the existing measurement procedures are appropriate.[2] The UPLC is pleased to respond that there has been no interference reported in any of the field trials by its members.

The UPLC's full document is available at: http://www.uplc.utc.org/file_depot/0-10000000/0-10000/7966/conman/03-104+Comments.doc

This statement is easily refuted. The ARRL (American Radio Relay League) sent a representative to 4 trial towns in which he drove around the streets in a vehicle equipped with a HF transceiver, and a mobile HF antenna. The RFI received was horrendous. A video of this trip showing the receiver S meter, and audio of the RFI is available for viewing at http://216.167.96.120/BPL_Trial-web.mpg (for high speed connections) and http://216.167.96.120/BPL_Trial-small.mpg (for dial-up connections).

Note that the RFI (Radio Frequency Interference) is constant while the operator is spinning the tuning knob on the transceiver and that the signal strengths likely would have been much greater with full sized/gain antennas.

The UPLC's statement is misleading in that "no reported interference" does not necessarily mean there was none, and that in the trials monitored by the ARRL, the RFI was severe.

I can imagine there will be terrible interference to other High Frequency spectrum users, even Homeland Security. It will compromise hams abilities to render service in times of emergencies. Police and fire frequencies could be bothered. BPL may also pick up ham, cb, and government transmissions and create tremendous interference problems in folks homes.

While BPL may be an "easy" answer for quick cash at the power companies, think of all the problems that will be created because of BPL.

I oppose BPL and ask the FCC to consider the potential negative consequences of allowing BPL to proceed.

Mike Fulcher
Amateur Radio Licensee KC7V
6545 E. Montgomery Rd.
Cave Creek, AZ 85331-3119
480-585-4800